UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE

UNITED STATES of AMERICA,

Case No: 3:13-00012 JUDGE TRAUGER Motion GRANTED conditioned upon the filing of waivers of speedy trial by all defendants.

VS.

CHARLES JEFFREY EDWARDS et al. /

JOINT AND UNOPPOSED MOTION FOR CONTINUANCE OF MARCH 11, 2014 TRIAL DATE

Comes Now the undersigned Counsel for Charles Jeffrey Edwards, Brenda Edwards and Jarrod Smith and respectfully petition this Honorable Court for a Continuance of the present March 11, 2014 trial date. In support the undersigned would show as follows:

- 1. The defendants are charged in a twenty-eight count Indictment with participating in a significant scheme to commit fraud, money laundering and obstruction. The case is presently set for trial on March 11, 2014 and expected to last 2-3 weeks.
- 2. Due to the complexity of this case the Defendants will not be prepared for trial by that time. Defense counsel have all been diligently trying to wade through the discovery and to conduct the necessary investigation of witnesses. The volume of complicated discovery material to review and the large number of potential witnesses to interview are the primary reasons for the need for additional time. Defense counsel would also like the Court to know that negotiations with the Government are ongoing and this additional time will allow both the defendants